

FILED

DEC - 5 2019

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

RONDA EAMES,

Defendant.

4:19CR00991 HEA/NAB

INDICTMENT

The Grand Jury charges that:

COUNTS 1-4

(Bank Fraud: 18 U.S.C. § 1344)

A. Introduction

1. At all times relevant to this Indictment, Bank of America, Midland States Bank, BMO Harris Bank, and Arvest Bank were financial institutions within the meaning of Title 18, United States Code, Section 20, because they were financial institutions insured by the Federal Deposit Insurance Corporation.

2. In February of 2017, defendant **RONDA EAMES** took a position as a Personal Banker at Midland States Bank located in Jefferson County, Missouri, in the Eastern District of Missouri.

3. On May 28, 2018, the defendant was promoted to the position of Assistant Banking Center Manager at Midland States Bank in Jefferson County, Missouri, in the Eastern District of Missouri.

4. In her capacity as a Personal Banker and subsequently as Assistant Banking Center Manager, the defendant had access to bank customers' accounts and was responsible for providing banking services to individual customers.

5. At all times relevant to this Indictment, the defendant was married to S.E.

B. The Scheme

6. It was part of the scheme and artifice that in between June of 2018 and August of 2018, the defendant made multiple unauthorized cash withdrawals from Midland States Bank customer accounts, all without the knowledge or consent of the customers from whose accounts the defendant had withdrawn the funds.

7. It was further part of the scheme and artifice that for each of these withdrawals, the defendant forged a withdrawal slip that indicated that the customer had approved and authorized the withdrawal from the customer's account, when, in truth and fact, the defendant had not informed the customer that she was making the withdrawal and had not sought the customers' authorization for those withdrawals.

8. It was further part of the scheme and artifice that for each of the unauthorized withdrawals the defendant made from Midland States Bank customer accounts, the defendant personally retained the withdrawn funds, and neither informed the customer of the withdrawal, nor returned the funds to the customer.

COUNTS 1-4

9. Each of the allegations of Paragraphs 1 through 8 of this Indictment is hereby incorporated by reference as if fully set forth herein.

10. On or about the dates set forth below, in the Eastern District of Missouri, the defendant,

RONDA EAMES,

knowingly executed and attempted to execute the aforesaid scheme and artifice to obtain any of the moneys, funds, credits, assets, securities, and other property owned by, and under the custody

and control of Midland States Bank, in that the defendant forged withdrawal slips drawn on each of the accounts described below, knowing that the account holders had not in fact authorized the withdrawals and that the withdrawals were made without the knowledge or consent of the legitimate account holders, as described below:

COUNT	DATE	FINANCIAL INSTITUTION	ACCOUNT HOLDER	ACCOUNT NUMBER	AMOUNT
1	6/14/2018	Midland States Bank	"CJP"	*****3866	\$795.60
2	7/5/2018	Midland States Bank	"FR"	*****6006	\$1,000.00
3	8/17/2018	Midland States Bank	"FR"	*****6006	\$1,000.00
4	8/27/2018	Midland States Bank	"FR"	*****0690	\$4,000.00

All in violation of Title 18, United States Code, Section 1344.

COUNTS 5-9
(Bank Fraud: 18 U.S.C. § 1344)

11. Each of the allegations of Paragraphs 1 through 10 of this Indictment is hereby incorporated by reference as if fully set forth herein.

A. The Scheme

12. It was part of the scheme and artifice that the defendant used the name of her husband, S.E., in order to obtain high-interest personal loans in S.E.'s name, without his knowledge or consent, and falsely represented in her loan applications that the recipient of the loan funds was S.E., when in truth and fact, it was the defendant, and not S.E., who received the loan funds and used them for personal expenses.

13. It was further part of the scheme and artifice that the defendant did not seek or obtain S.E.'s authorization to use his name and personal identification information in order to obtain these loans.

COUNTS 5-9

14. Each of the allegations of Paragraphs 1 through 13 of this Indictment is hereby incorporated by reference as if fully set forth herein.

15. On or about the dates set forth below, in the Eastern District of Missouri, the defendant,

RONDA EAMES,

knowingly executed and attempted to execute the aforesaid scheme and artifice to obtain any of the moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of the financial institutions identified below, in that the defendant falsely completed loan applications in the name of S.E. in order to obtain funds under the control of each of the financial institutions listed below, all without the knowledge or consent of S.E., as described below:

COUNT	DATE	LENDING COMPANY	FINANCIAL INSTITUTION	AMOUNT
5	4/3/2015	Heights Finance	BMO Harris Bank	\$605.56
6	9/9/2015	Tower Loan	Bank of America	\$2,503.93
7	10/27/2017	Empire Finance Company	Arvest Bank	\$550.00
8	11/10/2017	Security Finance	Bank of America	\$500.00
9	1/5/2018	Personal Finance Company	Bank of America	\$2539.00

All in violation of Title 18, United States Code, Section 1344.

COUNT 10**(Aggravated Identity Theft: 18 U.S.C. § 1028A)**

On or about the dates listed below, in the Eastern District of Missouri, the defendant,

RONDA EAMES,

did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, bank fraud, in violation of 18 U.S.C. § 1344, knowing that the means of identification belonged to another actual

person, in that the defendant used the name of S.E. in order to apply for and obtain a personal loan funded by a federally insured financial institution within the meaning of 18 U.S.C. § 20, all without the knowledge or authorization of S.E., as described below:

COUNT	DATE	MEANS OF IDENTIFICATION	FINANCIAL INSTITUTION	AMOUNT
10	4/3/2015	Name of S.E.	BMO Harris Bank	\$605.56

All in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNTS 11-16
(Bank Fraud: 18 U.S.C. § 1344)

16. Each of the allegations of Paragraphs 1 through 15 of this Indictment is hereby incorporated by reference as if fully set forth herein.

A. The Scheme

17. It was part of the scheme and artifice that beginning in or about 2017, the defendant asked S.E. to open several business bank accounts at the financial institution where she was employed, Midland States Bank.

18. It was further part of the scheme and artifice that the defendant accessed S.E.'s business bank accounts without his knowledge or consent.

19. It was further part of the scheme and artifice that the defendant made numerous unauthorized cash withdrawals from S.E.'s business bank accounts, all without his knowledge or consent.

20. It was further part of the scheme and artifice that the defendant drafted checks drawn on S.E.'s business bank accounts, forged his signature on those checks, and subsequently negotiated those checks, knowing that S.E. had not authorized the defendant to draft or sign those checks.

COUNTS 11-16

21. Each of the allegations of Paragraphs 1 through 20 of this Indictment is hereby incorporated by reference as if fully set forth herein.

22. On or about the dates set forth below, in the Eastern District of Missouri, the defendant,

RONDA EAMES,

knowingly executed and attempted to execute the aforesaid scheme and artifice to obtain any of the moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of Midland States Bank, in that the defendant drafted, signed, and negotiated checks drawn on accounts to which S.E. was the sole signatory, all without the knowledge or consent of S.E., as described below:

COUNT	DATE	CHECK NUMBER	ACCOUT NUMBER	AMOUNT
11	9/26/2017	1012	*****4064	\$1,700.00
12	10/26/2017	1011	*****4064	\$340.00
13	12/12/2017	1019	*****4064	\$485.00
14	8/28/2017	1001	*****2989	\$1,600.00
15	8/31/2017	1002	*****2989	\$700.00
16	8/29/2017	1002	*****3004	\$300.00

All in violation of Title 18, United States Code, Section 1344.

FORFEITURE ALLEGATION

The United States Attorney further alleges there is probable cause that:

1. Pursuant to Title 18, United States Code, Sections 982(a)(2), upon conviction of an offense in violation of Title 18, United States Code, Section 1344 as set forth in Counts 1-9 and 11-16, the defendant shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violation. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to such violation.

4. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

Dated: _____

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

Gwendolyn E. Carroll, NY 4657003
Assistant United States Attorney